

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

In Re: TROY ANTHONY EATON, SR., and
APRIL JULY EATON,

Case No.:15-71583-SCS

Debtors.

Chapter 7

LAWRENCE H. GLANZER, TRUSTEE,

Plaintiff,

vs.

APN: 15-07067-SCS

TROY ANTHONY EATON, SR., and
APRIL JULY EATON,

Defendants.

ANSWER TO COMPLAINT OBJECTING TO DISCHARGE

COMES NOW, Troy Anthony Eaton, Sr. and April July Eaton, Debtors, by counsel and for their Answer to Complaint Objecting to Discharge state as follows:

1) The Debtors admit paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14.

2) The Debtors admit paragraph 15 in so far as the Debtors did not amend Schedules or Statement of Financial Affairs before Trustee complaint but denied in so far as Debtors have subsequently amended the same.

Ronald J. Berg, VSB#7229
BERG & ASSOCIATES, P.C.
700 Newtown Road, Ste 110
Norfolk, Virginia 23502
Phone (757) 461-5557
Fax (757) 461-4021

- 3) In regards to paragraph 16 already answered herein.
- 4) In regards to paragraph 17 the Debtors had prepaid cards which they failed to identify as checking accounts.
- 5) Paragraphs 18, 19, and 20 are denied as to intent to conceal as any balances contained in the prepaid cards as proceeds were otherwise reported as earnings or tax refunds.
- 6) The Debtors admit paragraph 21.
- 7) The Debtors deny paragraph 22 as to intent.
- 8) The Debtors admit paragraph 23 as to time and dates but same denied as to intent.
- 9) In regards to paragraph 24 already answered herein.
- 10) The Debtors deny paragraphs 25, 26, and 27 as to intent.
- 11) In regards to paragraph 28 already answered herein.
- 12) The Debtors admit paragraph 29.
- 13) The Debtors deny paragraphs 30 and 31 in that no intentional refusal existed and the Debtors acknowledged at the 341 Hearing prepaid card references, and post complaint have amended their petition.

WHEREFORE, the Debtors pray that the Trustees Complaint Objecting to Discharge on count one concealment of property, and count two false oath, and count three withholding information, be

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dismissed and denied in that the actions of the Debtors do not justify denial of affirmative relief pursuant to 11 U.S.C. §727(a)(2), 11 U.S.C. §727(a)(4)(A) and 11 U.S.C. §727(a)(6).

TROY ANTHONY EATON, SR.
APRIL JULY EATON

BY: /s/ Ronald J. Berg
Of Counsel

CERTIFICATE OF MAILING

I, the undersigned, hereby certify that on this 26th day of August, 2015, I mailed/electronically mailed a true copy of the foregoing Answer to Complaint Objecting to Discharge to Kenneth N. Whitehurst, III, Esquire, Office of the United States Trustee, 200 Granby Street, Room 625, Norfolk, Virginia 23510, Lawrence H. Glanzer, Chapter 7 Trustee, 580 East Main Street, Suite 300, Norfolk, Virginia 23510, to Troy Anthony Eaton, Sr. And April July Eaton, Debtors, at 3496 Smokey Chamber Drive, Virginia Beach, Virginia 23462; and to all creditors and parties interest in the above referenced case.

/s/ Ronald J. Berg
Ronald J. Berg

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